

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

FTX RECOVERY TRUST,

Plaintiff,

- against -

GATE TECHNOLOGY INCORPORATED,
GATE GLOBAL, CORP., GATE
INFORMATION PTE. LTD., and SUN YUNZHI,

Defendants.

Adv. Pro. No. 24-50184 (KBO)

FTX RECOVERY TRUST,

Plaintiff,

-against-

FORIS DAX MT LTD., FORIS DAX ASIA PTE.
LTD., FORIS DAX, INC., and IRON BLOCK
CAPITAL,

Defendants.

Adv. Pro. No. 24-50188 (KBO)

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

FTX RECOVERY TRUST,

Plaintiffs,
- against -

AMERICAN ACTION NETWORK, INC.,
Defendant.

Adv. Pro. No. 24-50189 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,
- against -

AMERICAN PROSPERITY ALLIANCE,
Defendant.

Adv. Pro. No. 24-50190 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,
- against -

AMERICAN VALUES COALITION, INC.,
Defendant.

Adv. Pro. No. 24-50191 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,
- against -

CONGRESSIONAL LEADERSHIP FUND,
Defendant.

Adv. Pro. No. 24-50193 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

FARMINGTON STATE CORPORATION (f/k/a
FARMINGTON STATE BANK, d/b/a
GENIOME BANK, d/b/a MOONSTONE
BANK), FBH CORPORATION, and JEAN
CHALOPIN,

Defendant.

Adv. Pro. No. 24-50197 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

NEW YORK SOLIDARITY NETWORK,

Defendant.

Adv. Pro. No. 24-50199 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

ONE NATION, INC.,

Defendant.

Adv. Pro. No. 24-50200 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

PROSPERITY ALLIANCE, INC.,

Defendant.

Adv. Pro. No. 24-50201 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

SENATE LEADERSHIP FUND,

Defendant.

Adv. Pro. No. 24-50202 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

VOTO LATINO INC.,

Defendant.

Adv. Pro. No. 24-50203 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

WORKING AMERICA,

Defendant.

Adv. Pro. No. 24-50204 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

SECUREBIO, INC. dba SECUREBIO,

Defendant.

Adv. Pro. No. 24-50211 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

THE GOODLY INSTITUTE dba GOODLY
LABS,

Defendant.

Adv. Pro. No. 24-50212 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

SPARTZ PHILANTHROPIES, dba
RETHINK CHARITY and NONLINEAR,

Defendant.

Adv. Pro. No. 24-50213 (KBO)

FTX RECOVERY TRUST,

Plaintiffs,

- against -

MANIFOLD MARKETS, INC,

Defendant.

Adv. Pro. No. 24-50214 (KBO)

FTX RECOVERY TRUST, FTX DIGITAL
MARKETS, LTD.

Plaintiffs,

v.

BINANCE HOLDINGS LIMITED., BINANCE
CAPITAL MANAGEMENT CO. LTD,
BINANCE HOLDINGS (IE) LIMITED,
BINANCE (SERVICES) HOLDINGS LIMITED,
CHANGPENG ZHAO, DINGHUA XIAO,
SAMUEL WENJUN LIM, and DOES 1-1000

Defendants.

Adv. Pro. No. 24-50222 (KBO)

FTX RECOVERY TRUST,

Plaintiff,

- against -

KUROSEMI INC.,

Defendant.

Adv. Pro. No. 25-50635 (KBO)

**SECOND AMENDED² NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
JULY 22, 2025 AT 9:30 A.M. (ET), BEFORE THE HONORABLE KAREN B. OWENS,
CHIEF JUDGE AT THE UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 6TH
FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801**

**This proceeding will be conducted in-person. All counsel and witnesses are expected to
attend unless permitted to appear remotely via Zoom.**

**Please refer to Judge Owens's Chambers Procedures
(<https://www.deb.uscourts.gov/content/judge-karen-b-owens>) and the Court's website
(<https://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate
remotely, the method of allowed participation (video or audio), Judge Owens's expectations
of remote participants, and the advance registration requirements.**

² Amended items appear in bold.

Registration is required by 4:00 p.m. (ET) the business day before the hearing, unless otherwise noticed, using the *eCourtAppearances* tool available on the Court's website.

ADJOURNED MATTERS:

1. Motion for the Entry of an Order (I) Authorizing and Directing the Debtors to Return Certain Postpetition Cryptocurrency Deposits to D1 Ventures and (II) Granting Related Relief [D.I. 1584, filed on June 8, 2023]

Status: This matter is adjourned to a date to be determined.

2. Motion of Folkvang Ltd. for Entry of an Order (I) Authorizing Repurchase of Equity Interest in Folkvang Ltd. Held by Debtor Alameda Research Ltd., (II) Authorizing Folkvang Ltd.'s Repayment of Loan Made by Debtor Maclaurin Investments Ltd., (III) Allowing Setoff of Repurchase and Repayment Amounts and (IV) Granting Related Relief [D.I. 30579, filed on June 2, 2025]

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

3. Folkvang Ltd.'s Motion to File Under Seal Portions of (A) Motion of Folkvang Ltd. for Entry of An Order (I) Authorizing Repurchase of Equity Interest in Folkvang Ltd. Held by Debtor Alameda Research Ltd., (II) Authorizing Folkvang Ltd.'s Repayment of Loan Made by Debtor Maclaurin Investments Ltd., (III) Allowing Setoff of Repurchase and Repayment Amounts, and (IV) Granted Related Relief, and (B) Declaration of Michael Laurens Van Rossum in Support Thereof [D.I. 30580, filed on June 2, 2025]

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

4. Motion to Extend Time to Complete KYC Requirements [D.I. 30432, filed on May 16, 2025]

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

5. Motion to Appear Remotely Via Video Conference [D.I. 30433, filed on May 16, 2025]

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

ADJOURNED MATTERS – ADVERSARY PROCEEDINGS:

6. Notice of Pretrial Conference in an Adversary Proceeding [*FTX Recovery Trust v. Gate Technology Incorporated et al.*, Adv. No. 24-50184 – Adv. D.I. 3, filed on December 13, 2024]

Status: This matter is adjourned to a date to be determined.

7. Summons and Notice of Pretrial Conference in an Adversary Proceeding [*FTX Recovery Trust v. Foris DAX MT Ltd. et al.*, Adv. No. 24-50188 – Adv. D.I. 3 & 4, filed on December 13, 2024]

Status: This matter is adjourned to a date to be determined.

8. Summons and Notice of Pretrial Conference in an Adversary Proceeding – [*FTX Recovery Trust v. Farmington State Corporation*, Adv. No. 24-50197- Adv. D.I. 43 & 44, filed on June 19, 2025]

Status: This matter is adjourned to a date to be determined.

9. Summons and Notice of Pretrial Conference in an Adversary Proceeding – [*FTX Recovery Trust v. Prosperity Alliance, Inc.*, Adv. No. 24-50201 – Adv. D.I. 3, filed on November 26, 2024]

Status: This matter is adjourned to a date to be determined.

10. Summons and Notice of Pretrial Conference in an Adversary Proceeding [*FTX Recovery Trust v. The Goodly Institute*, Adv. No. 24-50212 – Adv. D.I. 3, filed on November 26, 2024]

Status: This matter is adjourned to a date to be determined.

11. Summons and Notice of Pretrial Conference in an Adversary Proceeding – [*FTX Recovery Trust v. Spartz Philanthropies, dba Rethink Charity et. al.*, Adv. No. 24-50213 – Adv. D.I. 3, filed on November 26, 2024]

Status: This matter is adjourned to a date to be determined.

12. Summons and Notice of Pretrial Conference in an Adversary Proceeding [*FTX Recovery Trust v. American Action Network, Inc.*, Adv. No. 24-50189 – Adv. D.I. 3, filed on November 26, 2024]

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

13. Summons and Notice of Pretrial Conference in an Adversary Proceeding [*FTX Recovery Trust v. American Prosperity Alliance*, Adv. No. 24-50190 – Adv. D.I. 3, filed on November 26, 2024]

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

14. Summons and Notice of Pretrial Conference in an Adversary Proceeding [*FTX Recovery Trust v. American Values Coalition, Inc.*, Adv. No. 24-50191 – Adv. D.I. 3, filed on November 26, 2024]

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

15. [Summons and Notice of Pretrial Conference in an Adversary Proceeding – \[FTX Recovery Trust v. Congressional Leadership Fund, Adv. No. 24-50193 – Adv. D.I. 3, filed on November 26, 2024\]](#)

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

16. [Summons and Notice of Pretrial Conference in an Adversary Proceeding – \[FTX Recovery Trust v. New York Solidarity Network, Adv. No. 24-50199 – Adv. D.I. 3, filed on November 26, 2024\]](#)

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

17. [Summons and Notice of Pretrial Conference in an Adversary Proceeding – \[FTX Recovery Trust v. One Nation, Inc., Adv. No. 24-50200 – Adv. D.I. 3, filed on November 26, 2024\]](#)

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

18. [Summons and Notice of Pretrial Conference in an Adversary Proceeding – \[FTX Recovery Trust v. Senate Leadership Fund, Adv. No. 24-50202 – Adv. D.I. 3, filed on November 26, 2024\]](#)

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

19. [Summons and Notice of Pretrial Conference in an Adversary Proceeding – \[FTX Recovery Trust v. Voto Latino Inc., Adv. No. 24-50203 – Adv. D.I. 3, filed on November 26, 2024\]](#)

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

20. [Summons and Notice of Pretrial Conference in an Adversary Proceeding – \[FTX Recovery Trust v. Working America, Adv. No. 24-50204 – Adv. D.I. 6, filed on November 26, 2024\]](#)

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

21. [Summons and Notice of Pretrial Conference in an Adversary Proceeding – \[FTX Recovery Trust v. Manifold Markets, Inc., Adv. No. 24-50214 – Adv. D.I. 3, filed on November 26, 2024\]](#)

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

22. [Summons and Notice of Pretrial Conference in an Adversary Proceeding – \[FTX Recovery Trust v. SecureBio, Inc. dba SecureBio, Adv. No. 24-50211 – Adv. D.I. 3, filed on November 26, 2024\]](#)

Status: This matter is adjourned to the hearing scheduled for August 12, 2025.

23. [Summons and Notice of Pretrial Conference in an Adversary Proceeding – \[FTX Recovery Trust v. Kurosemi Inc. – Adv. No. 25-50635 – Adv. D.I. 3, 4 & 5, filed on May 1, 23 & 30, 2025\]](#)

Status: This matter is adjourned to a date to be determined.

RESOLVED MATTERS:

24. [FTX Recovery Trust's One Hundred Seventy-Sixth \(Substantive\) Omnibus Objection to Certain No Liability Proofs of Claim \(Customer Claims\) \[D.I. 30625 & 30632, filed on June 4, 2025\]](#)

Status: On July 21, 2025, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

25. [FTX Recovery Trust's One Hundred Seventy-Seventh \(Non-Substantive\) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor \[D.I. 30626 & 30633, filed on June 4, 2025\]](#)

Status: On July 21, 2025, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

26. [FTX Recovery Trust's One Hundred Seventy-Eighth \(Substantive\) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim \(Customer Claims\) \[D.I. 30627 & 30634, filed on June 4, 2025\]](#)

Status: On July 21, 2025, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

27. [FTX Recovery Trust's One Hundred Seventy-Ninth \(Substantive\) Omnibus Objection to Certain Fully or Partially Unliquidated Proofs of Claim \(Customer Claims\) \[D.I. 30628 & 30635, filed on June 4, 2025\]](#)

Status: On July 21, 2025, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

28. [FTX Recovery Trust's One Hundred Eightieth \(Non-Substantive\) Omnibus Objection to Certain Partially Unliquidated Proofs of Claim \(Customer Claims\) \[D.I. 30630 & 30636, filed on June 4, 2025\]](#)

Status: On July 21, 2025, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

29. [FTX Recovery Trust's One Hundred Eighty-First \(Substantive\) Omnibus Objection to Certain Overstated Proofs of Claim \(Customer Claims\) \[D.I. 30631 & 30637, filed on June 4, 2025\]](#)

Status: On July 21, 2025, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

30. [Motion for Entry of an Order Authorizing Filing of Response Under Seal \[D.I. 30992, filed on June 23, 2025\]](#)

Status: On July 10, 2025, the Court entered an order granting the related relief. Accordingly, a hearing on this matter is not required.

31. [Motion of the FTX Recovery Trust for Entry of an Order Implementing Certain Procedures for Late-Filed Claims \[D.I. 31299, filed on July 8, 2025\]](#)

Status: On July 17, 2025, the Court entered an order granting the related relief. Accordingly, a hearing on this matter is not required.

MATTERS GOING FORWARD:

32. [Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 28643, filed on December 9, 2024\]](#)

Objection Deadline: April 7, 2025 at 4:00 p.m. (ET)

Responses Received:

- A. [Opposition to Debtors Amended Objection to Proofs of Claim and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) and Cross-Motion to Compel Arbitration \[D.I. 30077, April 7, 2025\]](#)

Related Documents:

- A. [Declaration of Henry Anthony Chambers in Support of Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination \[D.I. 28645, filed by December 9, 2024\]](#)
- B. [Declaration of Taro Tanaka \[D.I. 28646, filed by December 9, 2024\]](#)
- C. [Notice of Rescheduled Hearing Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 29397, filed on January 27, 2025\]](#)
- D. [Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 29591, filed on February 17, 2025\]](#)
- E. [Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 29707, filed on February 24, 2025\]](#)

- F. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29800, filed on February 28, 2025]
- G. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29886, filed on March 7, 2025]
- H. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 29933, filed on March 14, 2025]
- I. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 30009, filed on March 27, 2025]
- J. Declaration of Ryo Kawabata [D.I. 30078, filed on April 7, 2025]
- K. Declaration of Takane Hori [D.I. 30079, filed on April 7, 2025]
- L. Declaration of Takane Hori in Support of Payment of Post Petition Director's Fees [D.I. 30080, filed on April 7, 2025]
- M. Declaration of Seth Melamed in Support of Opposition to Debtors' Amended Objection to Proofs of Claim and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration [D.I. 30081, filed on April 7, 2025]
- N. Notice of Cross-Motion to Compel Arbitration [D.I. 30288, April 23, 2025]
- O. FTX Recovery Trust's Reply in Support of Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination and Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30364, filed on May 7, 2025]
- P. Declaration of Balakrishnan Ashok Kumar in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(b) and 510(c)(1) and in Support of Debtors' Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30365, filed on May 7, 2025]
- Q. Declaration of Henry Anthony Chambers in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 30366, filed on May 7, 2025]
- R. Declaration of Taro Tanaka in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(b) and 510(c)(1) and in Support of Debtors' Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30367, filed on May 7, 2025]

Status: The Court intends to issue a ruling on the matters argued on June 25, 2025.

33. [Opposition to Debtors Amended Objection to Proofs of Claim and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) and Cross-Motion to Compel Arbitration \[D.I. 30077, April 7, 2025\]](#)

Objection Deadline: May 7, 2025 at 4:00 p.m. (ET)

Responses Received: None

Related Documents:

- A. [Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 28643, filed on December 9, 2024\]](#)
- B. [Declaration of Henry Anthony Chambers in Support of Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination \[D.I. 28645, filed by December 9, 2024\]](#)
- C. [Declaration of Taro Tanaka \[D.I. 28646, filed by December 9, 2024\]](#)
- D. [Notice of Rescheduled Hearing Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 29397, filed on January 27, 2025\]](#)
- E. [Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 29591, filed on February 17, 2025\]](#)
- F. [Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 29707, filed on February 24, 2025\]](#)
- G. [Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 29800, filed on February 28, 2025\]](#)
- H. [Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 29886, filed on March 7, 2025\]](#)
- I. [Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510\(B\) and 510\(C\)\(1\) \[D.I. 29933, filed on March 14, 2025\]](#)

- J. Notice of Extension of Response Date Regarding Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 30009, filed on March 27, 2025]
- K. Declaration of Ryo Kawabata [D.I. 30078, filed on April 7, 2025]
- L. Declaration of Takane Hori [D.I. 30079, filed on April 7, 2025]
- M. Declaration of Takane Hori in Support of Payment of Post Petition Director's Fees [D.I. 30080, filed on April 7, 2025]
- N. Declaration of Seth Melamed in Support of Opposition to Debtors' Amended Objection to Proofs of Claim and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) and Cross-Motion to Compel Arbitration [D.I. 30081, filed on April 7, 2025]
- O. Notice of Cross-Motion to Compel Arbitration [D.I. 30288, April 23, 2025]
- P. FTX Recovery Trust's Reply in Support of Debtors' Amended Objection to Proofs of Claim Filed by Seth Melamed and Motion for Subordination and Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30364, filed on May 7, 2025]
- Q. Declaration of Balakrishnan Ashok Kumar in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(b) and 510(c)(1) and in Support of Debtors' Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30365, filed on May 7, 2025]
- R. Declaration of Henry Anthony Chambers in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(B) and 510(C)(1) [D.I. 30366, filed on May 7, 2025]
- S. Declaration of Taro Tanaka in Further Support of Debtors' Amended Objection to Proofs of Claim filed by Seth Melamed and Motion for Subordination Pursuant to 11 U.S.C. §§ 510(b) and 510(c)(1) and in Support of Debtors' Opposition to Claimant's Cross-Motion to Compel Arbitration [D.I. 30367, filed on May 7, 2025]
- T. Reply in Support of Melamed's Cross-Motion to Compel Arbitration [D.I. 30900, filed on June 18, 2025]

Status: The Court intends to issue a ruling on the matters argued on June 25, 2025.

- 34. Notice of Proposed Reduction of Disputed Claims Reserve Amount [D.I. 31085, filed on June 27, 2025]

Objection Deadline: July 11, 2025

Responses Received:

- A. Informal response from Woohyun Kang [July 3, 2025]
- B. [Objection to Notice of Proposed Reduction of Disputed Claims Reserve Amount \[D.I. 31286, filed on July 8, 2025\]](#)
- C. [Objection to Proposed Reduction of Disputed Claims Reserve Amount \[D.I. 31342, filed on July 10, 2025\]](#)
- D. [Limited Objection to Notice of Proposed Reduction of Disputed Claims Reserve Amount \[D.I. 31313, filed on July 10, 2025\]](#)
- E. [Objection to Proposed Reduction of Disputed Claims Reserve Amount \[D.I. 31487, filed on July 14, 2025\]](#)

Related Documents:

- A. [Declaration of Steven P. Coverick in Support of Proposed Reduction of Disputed Claims Reserve Amount \[D.I. 31086, filed on June 27, 2025\]](#)
- B. [Notice of Hearing on Proposed Reduction of Disputed Claims Reserve \[D.I. 31448, filed on July 15, 2025\]](#)
- C. [FTX Recovery Trust's Omnibus Reply to Objections to the Proposed Reductions of Disputed Claims Reserve Amount \[D.I. 31505, filed on July 17, 2025\]](#)

Status: This matter is going forward.

- 35. [Motion of the FTX Recovery Trust for Entry of an Order in Support of the Confirmed Plan Authorizing the FTX Recovery Trust to Implement the Restricted Jurisdiction Procedures in Potentially Restricted Foreign Jurisdictions \[D.I. 31148, filed on July 2, 2025\]](#)

Objection Deadline: July 15, 2025 at 4:00 p.m. (ET)

Responses Received: See **Exhibit A** attached hereto.

Related Documents:

- A. [Motion of the FTX Recovery Trust for Leave to File Omnibus Reply to the Objections to FTX Recovery Trust's Motion to Implement the Restricted Jurisdictions Procedures in Potentially Restricted Foreign Jurisdictions \[D.I. 31559, filed on July 20, 2025\]](#)

Status: This matter is going forward.

36. [Motion of ELD Capital LLC for Entry of Order Establishing Claims Determination Schedule for Its Claims \[D.I. 31298, filed on July 8, 2025\]](#)

Objection Deadline: July 15, 2025

Responses Received:

- A. [Objection of the FTX Recovery Trust to the Motion of ELD Capital LLC for Entry of Order Establishing Claims Determination Schedule for Its Claims \[D.I. 31442, filed on July 15, 2025\]](#)

Related Documents:

- A. [Reply of ELD Capital LLC in Further Support of Its Motion for Entry of Order Establishing Claims Determination Schedule for Its Claims \[D.I. 31497, filed on July 17, 2025\]](#)

Status: This matter is going forward.

37. [Motion of the FTX Recovery Trust for Leave to File Omnibus Reply to the Objections to FTX Recovery Trust's Motion to Implement the Restricted Jurisdictions Procedures in Potentially Restricted Foreign Jurisdictions \[D.I. 31559, filed on July 20, 2025\]](#)

Objection Deadline: At or before the hearing.

Responses Received:

- A. **Informal Response from Zhu Ming [Received via email on July 22, 2025]**

Related Documents:

- A. [Motion of the FTX Recovery Trust for Entry of an Order in Support of the Confirmed Plan Authorizing the FTX Recovery Trust to Implement the Restricted Jurisdiction Procedures in Potentially Restricted Foreign Jurisdictions \[D.I. 31148, filed on July 2, 2025\]](#)

Status: This matter is going forward.

ADVERSARY MATTERS GOING FORWARD:

38. [Notice of Scheduling Conference Scheduled for July 22, 2025 at 9:30 a.m. \(ET\) – \[FTX Recovery Trust, et al. v. Binance Holdings Limited et al., Adv. No. 24-50222 – Adv. D.I. 83, filed on June 26, 2025\]](#)

Status: This matter is going forward as a scheduling conference.

Dated: July 22, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce
Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
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